

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Dana A. Valley**

<b>Lorie A. Valley</b>	)	<b>Chapter 13</b>
<b>Debtors</b>	)	<b>Case No. 1:18-bk-00968</b>
	)	
<b>New Cumberland Federal Credit Union</b>	)	
<b>Movant</b>	)	
<b>v.</b>	)	
	)	
<b>Dana A. Valley</b>	)	
<b>Lorie A. Valley</b>	)	
<b>Respondents</b>	)	
	)	
<b>Charles DeHart, III, Trustee</b>	)	

**DEBTORS' RESPONSE TO MOTION OF NEW CUMBERLAND FEDERAL CREDIT  
UNION, MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362  
PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

1. Movant, New Cumberland Federal Credit Union filed its Motion for Relief on May 22, 2018.
2. Debtors have provided proof of insurance to Movant.
3. Debtors have worked out adequate protection issues with Movant.
4. Debtors request the Court deny Movant's Motion for Relief.

WHEREFORE, Debtor's, Dana A. Valley and Lorie A. Valley, prays the Court enter its Order denying the Motion for Relief from the Automatic Stay that was filed on May 22, 2018 by New Cumberland Federal Credit Union.

Dated: June 5, 2018

Respectfully Submitted,

/s/Stephen Wade Parker  
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